

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

Kimberly-Clark Worldwide, Inc., and
Kimberly-Clark Global Sales, LLC,

Plaintiffs,

Case No. 10-CV-01118

v.

Judge William C. Griesbach

First Quality Baby Products, LLC,
First Quality Retail Services, LLC, and
First Quality Consumer Products, LLC,

Defendants.

FIRST QUALITY'S MOTION FOR SANCTIONS UNDER FED. R. CIV. P. 11

Defendants/Counterclaim-Plaintiffs First Quality Baby Products, LLC First Quality Retail Services, LLC and First Quality Consumer Products, LLC (collectively "First Quality") respectfully move this Court to sanction Kimberly-Clark Worldwide, Inc., Kimberly-Clark Global Sales, LLC and the law firm of Banner & Witcoff, Ltd. pursuant to Rule 11 of the Federal Rules of Civil Procedure. First Quality's arguments in support of this Motion are set forth in its accompanying Memorandum.

Date: February 15, 2011

Respectfully submitted,

s/ Michael V. Solomita

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